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November 9, 2022

By ECF

Hon. Loretta A. Preska United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: United States v. Ishan Wahi, 22-cr-392 (S.D.N.Y.)

Your Honor:

I am one of the lawyers representing defendant Ishan Wahi in this case. I write to respectfully request that the Court approve Mr. Wahi's travel to Houston, Texas on November 11th, returning to his home in Seattle, Washington on November 20th. As he has discussed with U.S. Pretrial Services, Mr. Wahi is considering relocating from Seattle, Washington to Houston, Texas for the following reasons.

Mr. Wahi currently resides in Seattle, but does not expect to be able to continue to live there for much longer due to financial reasons. Mr. Wahi wishes to visit his partner, an attorney residing in Houston, and also one of the financially responsible persons who cosigned his bond. His partner is unable to visit Seattle due to work obligations. Mr. Wahi and his partner wish to meet as they contemplate major decisions with respect to their lives together, including finalizing living arrangements as Mr. Wahi plans a move to Texas in the coming months. As part of this trip, Mr. Wahi intends to view a number of potential rental apartments in Houston. Should he decide to make such a permanent move, Mr. Wahi will make an appropriate application to the Court in advance.

As part of the conditions of release that the Court set for Mr. Wahi on August 3, 2022, his travel was restricted to the Western District of Washington and the Southern and Eastern Districts of New York. Mr. Wahi has complied with all the terms of his conditions of release to date. As permitted by a previous Order of this Court, Mr. Wahi traveled to Houston on October 13th and returned to Seattle on October 19th.

The government (AUSA Noah Solowiejczyk) opposes this request. US Pretrial Services for the Western District of Washington (LMS Gilbert) and US Pretrial Services for the Southern District of New York (ISS Lettieri) oppose this request. Pretrial does not authorize travel outside the district except for emergencies. The Mavel is approved to Jong as M. Wahi provides neural with all the delails advance,

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9/22 UNITED STATES DISTRICT JUDGE